

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

In Re: New York City Policing During Summer
2020 Demonstrations

x

20 Civ. 8924 (CM)(GWG)

This filing is related to:

KRYSTIN HERNANDEZ, NATALIE
BAKER, ETHAN CHIEL, KYLA RASKIN,
REX SANTUS, ROXANNE ZECH,
RAFAEL-LEV GILBERT, SARAH MILLS-
DIRLAM, AUGUST LEINBACH, JALEN
MATNEY, JONATHAN DAVIS, and DAVID
HOLTON,

21 Civ. 7406 (CM)(GWG)

Plaintiffs,

- against -

THE CITY OF NEW YORK; NEW YORK
CITY MAYOR BILL DE BLASIO; NEW
YORK POLICE DEPARTMENT (“NYPD”)
COMMISSIONER DERMOT SHEA; NYPD
CHIEF OF DEPARTMENT TERENCE
MONAHAN; NYPD DEPUTY
COMMISSIONER FOR LEGAL MATTERS
ERNEST F. HART; NYPD ASSISTANT
CHIEF KENNETH LEHR; NYPD LEGAL
BUREAU SERGEANT KENNETH RICE;
NYPD STRATEGIC RESPONSE GROUP
 (“SRG”) MEMBER FIRST NAME
UNKNOWN (“FNU”) RABEL; NYPD
SUPERVISOR FNU HYLAND; and NYPD
MEMBERS JOHN AND JANE DOES 1-157,

Defendants.

x

STIPULATION

Pursuant to Federal Rule of Civil Procedure 26(d)(1), Plaintiffs Krystin Hernandez, Natalie Baker, Ethan Chiel, Kyla Raskin, Rex Santus, Roxanne Zech, Rafael-Lev Gilbert, Sarah Mills-Dirlam, August Leinbach, Jalen Matney, Jonathan Davis, and David Holton (the *Hernandez* Plaintiffs) and Defendants agree that the *Hernandez* Plaintiffs and Defendants may

immediately seek and serve discovery, including third-party discovery, relating to the claims, defenses, and issues in *Hernandez*, civil action 21 Civ. 7406 (CM)(GWG). The parties further agree that:

1. All parties will abide by the protective order entered as Docket 115 in civil action 20 Civ. 8924 (CM)(GWG) in this matter; and
2. All discovery that has been and will be conducted in the consolidated cases will be deemed part of *Hernandez*, without the need for either party to re-disclose it, respecting any confidentiality designations that are in place.

Dated: December 15, 2021
New York, New York

[SIGNATURES ON FOLLOWING PAGE]

COHEN&GREEN P.L.L.C.

By:  Remy Green

Elena L. Cohen
J. Remy Green
Jessica Massimi

1639 Centre Street, Suite 216
Ridgewood (Queens), NY 11385
t: (929) 888-9480
f: (929) 888-9457
e: elena@femmelaw.com
remy@femmelaw.com
jessica@femmelaw.com

-and-

Gideon Orion Oliver
277 Broadway, Suite 1501
New York, NY 10007
t: 718-783-3682
f: 646-349-2914
Gideon@GideonLaw.com

Attorneys for Hernandez Plaintiffs

NYC CITY LAW DEPARTMENT

By: Dara L. Weiss s/

Dara L. Weiss
100 Church Street
New York, New York, 10007
(212) 356-3517
Phone: (212) 356-3517
Fax: (212) 356-3509
Daweiss@law.nyc.gov

Attorney for Defendants